

EXHIBIT 32

FILED UNDER SEAL

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

FAIR ISAAC CORPORATION,

Court File No. 16-cv-1054 (WMW/DTS)

Plaintiff,

v.

**FEDERAL INSURANCE COMPANY'S
SEVENTH SUPPLEMENTAL
ANSWER TO PLAINTIFF'S
INTERROGATORY NO. 17**

FEDERAL INSURANCE COMPANY,
an Indiana corporation, and ACE
AMERICAN INSURANCE COMPANY, a
Pennsylvania corporation,

Defendants.

To: Plaintiff and its attorneys, Allen Hinderaker, Heather Kliebenstein and Michael A. Erbele, Merchant & Gould P.C., 3200 IDS Center, 80 South Eighth Street, Minneapolis, MN 55402.

Defendant Federal Insurance Company ("Federal"), for its Seventh Supplemental Answer to Plaintiff's Interrogatory No. 17, states and alleges as follows:

GENERAL RESPONSES

1. Federal objects to the Definitions and Instructions to the extent that they seek to impose obligations on Federal that either exceed, or are different from, what is required under the Federal Rules of Civil Procedure, District of Minnesota Local Rules, and the Stipulated E-Discovery Order.

2. Federal objects to the requests to the extent that they seek information protected from discovery under the attorney-client privilege or work product doctrine.

3. Federal's responses and objections are made to the best of Federal's present knowledge, information, and belief. Federal's responses and objections are limited to information within its possession, custody, or control. Federal reserves the right to amend,

supplement, or change any responses and objections if and when additional, different, or more accurate information becomes available and/or facts are developed.

4. Federal gives these Responses subject to all objections to admissibility that may be interposed in this proceeding.

SEVENTH SUPPLEMENTAL ANSWER TO INTERROGATORY NO. 17

INTERROGATORY NO. 17: For all insurance policies in connection with which the Blaze Advisor® software was used, the gross written premium of Defendants and the gross written premium of each related company, including the specific identification of each related company, for each quarter from March 30, 2016 to date. For clarity, this Interrogatory is not seeking investment income, other income, or capital and surplus accounts.

SUPPLEMENTAL ANSWER: Federal objects to the request for “all” insurance policies as overbroad, unduly burdensome, and not proportional to the needs of this case. Federal also objects to this Interrogatory as compound and impermissibly constituting multiple interrogatories, which are limited in number under the Federal Rules. Federal also objects to this Interrogatory as vague and ambiguous in failing to identify the relevant “use” and calling for insurance policies “in connection with.” Federal further objects to this Interrogatory because “the gross written premium” of Defendants and the “gross written premium of each related company” are not relevant to any claim or defense in this action, including because Defendants’ profits are not reasonably related to the alleged infringement, as is necessary for FICO to obtain an award of the defendants’ profits. *See, e.g., Francois v. Ruch*, 2006 WL 3735950, at *3 (C.D. Ill. Dec. 15, 2006). Federal further objects to the extent the Interrogatory seeks information not in the possession, custody, or control of Federal, and thus exceeds the scope of discovery under Federal Rule 26(b)(1).

Subject to, and without waiving these objections, Federal states the following:

- For the Financial Lines Unit (post-merger) for the years identified below, the following applications use Blaze Advisor® software: CSI Express, Decision Point, Automated Renewal Process, Profitability Indicator, and Defined Book Run. The approximate gross

written premiums, policy counts, and identification of the insurance writing companies that issued insurance policies that used these applications, in connection with which the Blaze Advisor® software was used, is provided in the charts below for the years requested.

- **For Decision Point (DP):**

Year / Writing Company	Gross Written Premium	Policy Count
2019	\$1,347,731.00	466.00
CICNJ	\$80,257.00	19.00
ERII	\$14,133.00	1.00
FIC-D	\$1,253,341.00	446.00
2018	\$4,814,337.77	1697.00
CICNJ	\$236,749.00	71.00
ERII	\$34,899.00	5.00
FIC-D	\$4,542,689.77	1621.00
2017	\$4,319,855.92	1447.00
CICNJ	\$319,436.68	82.00
ERII	\$34,636.00	3.00
FIC-D	\$3,965,783.24	1362.00
2016	\$3,547,608.80	1162.00
CICNJ	\$182,249.80	43.00
ERII	\$5,465.00	1.00
FIC-D	\$3,359,894.00	1118.00

- **For CSI eXPRESS (CSIX), Automated Renewal Process (ARP), Profitability Indicator (PI), and Defined Book Run (DBR):**

Year / Writing Company	Gross Written Premium	Policy Count
2016	\$1,526,511,534.36	90555
CSIX/ARP/PI	\$1,444,514,455.23	82191
CICNJ	\$21,543,942.90	1893
ERII	\$74,655,072.17	5326
ERSIC	\$31,403,417.00	1466
FIC-D	\$1,210,424,578.61	68552
PACIFICPI	\$150,747.00	64
VIG-D	\$7,425,581.00	98
CICC-CN	\$98,911,116.55	4792
New Business PI excluding DP	\$81,997,079.13	8364
CICNJ	\$2,212,095.00	268
ERII	\$492,570.48	52
ERSIC	\$1,026,440.46	72
FIC-D	\$75,579,124.19	7694
PACIFICPI	\$206,637.00	34
CICC-CN	\$2,480,212.00	244
2017	\$1,462,910,856.49	91631

Year / Writing Company	Gross Written Premium	Policy Count
CSIX/ARP/PI	\$1,351,871,992.43	82188
CICNJ	\$20,940,256.13	1999
ERII	\$62,459,326.84	4808
ERSIC	\$28,856,329.46	1389
FIC-D	\$1,132,709,567.53	69042
PACIFICPI	\$331,853.03	86
VIG-D	\$6,697,327.00	71
CICC-CN	\$99,877,332.44	4793
New Business PI excluding DP	\$111,038,864.06	9443
CICNJ	\$2,916,920.00	250
ERII	\$441,480.80	23
ERSIC	\$1,256,712.58	93
FIC-D	\$101,305,050.77	8483
PACIFICPI	\$262,033.00	44
VIG-D	\$3,346.00	1
CICC-CN	\$4,853,320.91	549
2018	\$1,406,041,567.67	93653
CSIX/ARP/PI	\$1,268,911,770.98	82523
CCIC	\$3,309,818.00	195
CICNJ	\$22,833,376.00	2098
ERII	\$49,158,127.00	4254
ERSIC	\$11,370,649.00	797
FIC-D	\$1,084,053,466.78	70090
PACIFICPI	\$384,509.00	55
VIG-D	\$5,071,070.00	53
CICC-CN	\$92,730,755.20	4981
New Business PI excluding DP	\$137,129,796.69	11130
CCIC	\$1,210,985.00	46
CICNJ	\$3,180,349.00	376
ERII	\$10,429.00	4
ERSIC	\$1,377,654.00	100
FIC-D	\$126,368,941.69	10050
PACIFICPI	\$101,678.00	21
CICC-CN	\$4,879,760.00	533
2019	\$302,773,970.00	30021
CSIX/ARP/PI	\$275,066,375.00	27267
CCIC	\$2,618,203.00	184
CICNJ	\$6,335,054.00	702
ERII	\$11,593,477.00	1323
FIC-D	\$241,187,027.00	23734
PACIFICPI	\$105,626.00	22
VIG-D	\$220,288.00	11
CICC-CN	\$13,006,700.00	1291
New Business PI excluding DP	\$27,707,595.00	2754

Year / Writing Company	Gross Written Premium	Policy Count
CCIC	\$209,354.00	17
CICNJ	\$588,605.00	77
FIC-D	\$26,215,624.00	2562
PACIFICPI	\$5,075.00	2
VIG-D	\$2,296.00	1
CICC-CN	\$686,641.00	95

- CSI eXPRESS, Automated Renewal Process, and Profitability Indicator are combined all together in one chart because creating a separate chart for each application would result in triple-counting of the policy counts and gross written premiums. In other words, policies and premiums that go through one of these applications goes through the other two applications as well.
- Defined Book Run, a process within CSI eXPRESS, is used to generate profitability analyses for informational purposes. The DBR process has been used on policies that do not reside within CSI eXPRESS and are not included in the premium and writing company information above. For these policies outside CSI eXPRESS, the writing company names are not captured, and the premiums actually charged are not required to be and were generally not specified, and therefore, are generally not available. DBR is not used to generate any premiums, or write any policy.
- For Corporate Business Systems (CBS), which is not a strategic business unit (SBU), the following application uses Blaze Advisor® software: Premium Booking. The approximate gross written premiums and policy counts that used these applications, in connection with which the Blaze Advisor® software was used, is provided in the charts below for the years requested. Discovery is continuing.

Year	Gross Written Premium	Policy Count
2018	\$500,850,828.90	57,023
2017	\$442,839,931.87	60,142
2016	\$503,432,073.43	57,219

- The data for Premium Booking is extracted from a mainframe DB2 table that is specifically tracking the policies that passed through the Premium Booking “rules” as constructed in/using the Blaze Advisor® tool. Unfortunately, this table does not include writing company and that information could not be correlated to the policy count/gross written premium values being provided.
- For the Chubb Commercial Insurance (CCI) business unit for the years identified below (post-merger), the following applications use Blaze Advisor® software: CUW-IM, TAPS, and IRMA. The approximate gross written premiums, policy counts, and identification of the insurance writing companies that issued insurance policies that used these applications, in connection with which the Blaze Advisor® software was used, is provided in the charts below for the years requested. Discovery is continuing.

• **For CUW-IM:¹**

YEAR	WRITING COMPANY	POLICY COUNT	WRITTEN PREMIUM
2016	CHUBB CUSTOM INSURANCE COMPANY	2,127	\$217,444,131.00
	CHUBB DE MEXICO COMPANIA DE SEGUROS, S.A.	8	\$41,810.00
	CHUBB EUROPEAN GROUP SE	44	\$260,360.00
	CHUBB INDEMNITY INSURANCE COMPANY	4,475	\$515,778,122.00
	CHUBB INSURANCE AUSTRALIA LIMITED	6	\$223,981.00
	CHUBB INSURANCE COMPANY LIMITED	4	\$10,686.00
	CHUBB INSURANCE COMPANY OF CANADA	7	\$173,352.00
	CHUBB INSURANCE COMPANY OF NEW JERSEY	3,635	\$69,278,561.00
	CHUBB NATIONAL INSURANCE COMPANY	1,223	\$50,975,438.00
	CHUBB SEGUROS BRASIL, S.A.	2	\$4,281.00
	EXECUTIVE RISK INDEMNITY INC.	13	\$2,167,006.00
	EXECUTIVE RISK SPECIALTY INSURANCE COMPANY	28	\$4,528,627.00
	FEDERAL INSURANCE COMPANY	141,235	\$4,800,540,559.00
	GREAT NORTHERN INSURANCE COMPANY	30,523	\$868,809,231.00
	PACIFIC INDEMNITY COMPANY	4,568	\$426,214,814.00
	VIGILANT INSURANCE COMPANY	6,478	\$307,080,046.00
	ACE American Insurance Co	2,890	\$108,983,073.98
	ACE Fire Underwriters Ins	38	\$1,092,991.43
	ACE Property and Casualty	768	\$106,304,729.88
	Illinois Union Insurance	1,183	\$81,709,115.00
	Indemnity Insurance Co of	97	\$17,014,247.06
	Pacific Employers Insurance	6	\$469,700.00
	Westchester Surplus Lines	132	\$12,587,416.00
	WFIC for Bus.Eff.1/1/11	1,010	\$31,266,954.00
2017	CHUBB CUSTOM INSURANCE COMPANY	1,119	\$125,046,576.00
	CHUBB DE MEXICO COMPANIA DE SEGUROS, S.A.	2	\$12,403.00
	CHUBB EUROPEAN GROUP SE	40	\$368,955.00
	CHUBB INDEMNITY INSURANCE COMPANY	5,986	\$581,425,852.00
	CHUBB INSURANCE AUSTRALIA LIMITED	2	\$5,554.00
	CHUBB INSURANCE COMPANY LIMITED	3	\$7,913.00
	CHUBB INSURANCE COMPANY OF CANADA	2	\$14,184.00
	CHUBB INSURANCE COMPANY OF NEW JERSEY	3,432	\$65,809,698.00
	CHUBB NATIONAL INSURANCE COMPANY	1,906	\$68,554,767.00
	CHUBB SEGUROS BRASIL, S.A.	2	\$16,297.00
	EXECUTIVE RISK INDEMNITY INC.	11	\$2,732,882.00
	EXECUTIVE RISK SPECIALTY INSURANCE COMPANY	11	\$1,102,030.00
	FEDERAL INSURANCE COMPANY	147,481	\$5,098,798,285.00
	GREAT NORTHERN INSURANCE COMPANY	31,605	\$912,720,319.00
	PACIFIC INDEMNITY COMPANY	4,825	\$468,474,693.00
	VIGILANT INSURANCE COMPANY	6,461	\$324,338,205.00
	ACE American Insurance Co	8,243	\$354,885,926.81
	ACE Fire Underwriters Ins	53	\$1,722,590.00
	ACE Property and Casualty	2,413	\$248,919,844.00

¹ We understand that this financial information includes policies that were brought in under a system that includes policies that are renewed using Blaze, but automatically at the same time includes the prior transaction involving the same policy regardless whether it uses Blaze. We are seeking a way to not include the prior policy since it results in the financial information having inflated numbers.

YEAR	WRITING COMPANY	POLICY COUNT	WRITTEN PREMIUM
	Illinois Union Insurance	3,444	\$255,341,641.00
	Indemnity Insurance Co of	281	\$21,351,439.00
	Pacific Employers Insurance	21	\$869,381.00
	Westchester Surplus Lines	476	\$45,285,709.00
	WFIC for Bus.Eff.1/1/11	2,246	\$67,191,783.00
2018	CHUBB CUSTOM INSURANCE COMPANY	610	\$68,563,377.00
	CHUBB DE MEXICO COMPANIA DE SEGUROS, S.A.	1	\$16,435.00
	CHUBB EUROPEAN GROUP SE	16	\$85,623.00
	CHUBB INDEMNITY INSURANCE COMPANY	4,962	\$443,033,892.00
	CHUBB INSURANCE AUSTRALIA LIMITED	1	\$25,208.00
	CHUBB INSURANCE COMPANY LIMITED	1	\$6,135.00
	CHUBB INSURANCE COMPANY OF CANADA	1	\$6,754.00
	CHUBB INSURANCE COMPANY OF NEW JERSEY	1,799	\$32,946,513.00
	CHUBB NATIONAL INSURANCE COMPANY	1,582	\$66,309,955.00
	CHUBB SEGUROS BRASIL, S.A.	1	\$642.00
	EXECUTIVE RISK INDEMNITY INC.	6	\$1,661,561.00
	EXECUTIVE RISK SPECIALTY INSURANCE COMPANY	3	\$213,165.00
	FEDERAL INSURANCE COMPANY	90,925	\$3,558,748,157.00
	GREAT NORTHERN INSURANCE COMPANY	22,807	\$710,266,687.00
	PACIFIC INDEMNITY COMPANY	3,356	\$369,995,206.00
	VIGILANT INSURANCE COMPANY	4,193	\$227,639,141.00
	ACE American Insurance Co	6,740	\$274,751,661.00
	ACE Fire Underwriters Ins	38	\$1,498,240.00
	ACE Property and Casualty	1,971	\$191,070,156.00
	Illinois Union Insurance	3,372	\$240,820,970.00
	Indemnity Insurance Co of	175	\$13,196,308.00
	Pacific Employers Insurance	14	\$51,084.00
	Westchester Surplus Lines	602	\$49,388,448.00
	WFIC for Bus.Eff.1/1/11	1,273	\$36,242,321.00
2019	CHUBB CUSTOM INSURANCE COMPANY	43	\$6,693,927.00
	CHUBB INDEMNITY INSURANCE COMPANY	486	\$50,083,542.00
	CHUBB INSURANCE COMPANY OF NEW JERSEY	97	\$2,469,028.00
	CHUBB NATIONAL INSURANCE COMPANY	124	\$6,526,910.00
	FEDERAL INSURANCE COMPANY	6,032	\$417,370,954.00
	GREAT NORTHERN INSURANCE COMPANY	1,745	\$97,044,347.00
	PACIFIC INDEMNITY COMPANY	233	\$39,736,490.00
	VIGILANT INSURANCE COMPANY	220	\$25,155,354.00
	ACE American Insurance Co	374	\$13,255,599.00
	ACE Fire Underwriters Ins	2	\$185,620.00
	ACE Property and Casualty	23	\$7,502,715.00
	Illinois Union Insurance	270	\$24,843,797.00
	Indemnity Insurance Co of	4	\$66,049.00
	Westchester Surplus Lines	3	\$538,022.00
	WFIC for Bus.Eff.1/1/11	18	\$174,830.00

• **For TAPS:**

YEAR	WRITING COMPANY	POLICY COUNT	WRITTEN PREMIUM
2016	CHUBB INDEMNITY INSURANCE COMPANY	207	\$73,264,108.51

YEAR	WRITING COMPANY	POLICY COUNT	WRITTEN PREMIUM
	CHUBB NATIONAL INSURANCE COMPANY	7	\$561,041.00
	FEDERAL INSURANCE COMPANY	536	\$143,625,269.12
	GREAT NORTHERN INSURANCE COMPANY	20	\$8,309,789.00
	PACIFIC INDEMNITY COMPANY	79	\$42,217,709.72
	VIGILANT INSURANCE COMPANY	47	\$17,102,989.00
2017	CHUBB INDEMNITY INSURANCE COMPANY	239	\$45,571,577.11
	CHUBB NATIONAL INSURANCE COMPANY	10	\$1,864,828.00
	FEDERAL INSURANCE COMPANY	496	\$144,179,731.68
	GREAT NORTHERN INSURANCE COMPANY	14	\$5,976,054.00
	PACIFIC INDEMNITY COMPANY	88	\$45,768,062.54
	VIGILANT INSURANCE COMPANY	34	\$8,858,947.00
2018	CHUBB INDEMNITY INSURANCE COMPANY	248	\$39,388,714.07
	CHUBB NATIONAL INSURANCE COMPANY	23	\$5,073,844.00
	FEDERAL INSURANCE COMPANY	484	\$123,103,492.27
	GREAT NORTHERN INSURANCE COMPANY	18	\$5,192,985.00
	PACIFIC INDEMNITY COMPANY	78	\$37,960,159.00
	VIGILANT INSURANCE COMPANY	19	\$5,771,749.00
2019	CHUBB INDEMNITY INSURANCE COMPANY	15	\$428,683.00
	CHUBB NATIONAL INSURANCE COMPANY	3	\$27,056.00
	FEDERAL INSURANCE COMPANY	54	\$5,438,248.00
	PACIFIC INDEMNITY COMPANY	13	\$1,779,809.00
	VIGILANT INSURANCE COMPANY	4	\$578,262.00

• **For IRMA:**

YEAR	WRITING COMPANY	POLICY COUNT	WRITTEN PREMIUM
2016	ALBANY INSURANCE COMPANY	1	\$7,252.00
	CHUBB CUSTOM INSURANCE COMPANY	92	\$615,040.00
	CHUBB DE MEXICO	2	\$19,419.68
	CHUBB DE MEXICO COMPANIA DE SEGUROS, S.A.	4	\$5,451.43
	CHUBB INSURANCE AUSTRALIA LIMITED	7	\$33,636.74
	CHUBB INSURANCE COMPANY LIMITED	6	\$3,758.22
	CHUBB INSURANCE COMPANY OF CANADA	1815	\$10,045,178.53
	CHUBB INSURANCE COMPANY OF NEW JERSEY	253	\$1,108,829.00
	FEDERAL INSURANCE COMPANY	11876	\$68,744,410.52
	GREAT NORTHERN INSURANCE COMPANY	3839	\$17,031,473.49
	PACIFIC INDEMNITY COMPANY	459	\$3,894,125.04
	SELF-INSURED RETENTION	1	\$750.00
	VIGILANT INSURANCE COMPANY	714	\$3,757,327.16
2017	CHUBB CUSTOM INSURANCE COMPANY	6	\$13,803.00
	CHUBB DE MEXICO	1	\$7,175.34
	CHUBB DE MEXICO COMPANIA DE SEGUROS, S.A.	2	\$4,582.26
	CHUBB EUROPEAN GROUP SE	1	\$32,575.09
	CHUBB INSURANCE AUSTRALIA LIMITED	2	\$10,500.40
	CHUBB INSURANCE COMPANY LIMITED	4	\$15,067.52
	CHUBB INSURANCE COMPANY OF CANADA	1863	\$10,196,153.18
	CHUBB INSURANCE COMPANY OF NEW JERSEY	248	\$889,740.00
	FEDERAL INSURANCE COMPANY	11534	\$66,294,342.58

YEAR	WRITING COMPANY	POLICY COUNT	WRITTEN PREMIUM
	GREAT NORTHERN INSURANCE COMPANY	3723	\$16,015,552.22
	PACIFIC INDEMNITY COMPANY	420	\$2,860,462.66
	VIGILANT INSURANCE COMPANY	684	\$3,348,817.42
2018	CHUBB CUSTOM INSURANCE COMPANY	2	\$4,782.00
	CHUBB INSURANCE COMPANY OF CANADA	1831	\$11,668,247.00
	CHUBB INSURANCE COMPANY OF NEW JERSEY	217	\$966,870.00
	FEDERAL INSURANCE COMPANY	10318	\$59,180,523.71
	GREAT NORTHERN INSURANCE COMPANY	3444	\$15,149,787.68
	PACIFIC INDEMNITY COMPANY	388	\$2,586,049.98
	VIGILANT INSURANCE COMPANY	644	\$3,085,724.04

- ERCIS Claims is a claims system (not a policy system), and therefore, there is no gross written premium or policy count associated with the application.
- For the Surety business unit for the years identified below (post-merger), the following application does not use Blaze Advisor® software: Cornerstone. However, as ordered by the Court, below are the approximate gross written premiums, policy counts, and identification of the insurance writing company that issued insurance policies that used Cornerstone:

Year/Writing Company	Policy Count	Gross Written Premium
2016	324291	\$237,436,826
Chubb Ins Co of Canada	13961	\$7,408,108
Federal Ins Co - Canada	10	\$0
Federal Insurance Co	285113	\$220,608,093
Great Northern Insurance Co	18	\$0
Pacific Indemnity Co	7427	\$5,000,954
Vigilant Insurance Co	17762	\$4,419,671
2017	318828	\$259,641,111
Chubb Ins Co of Canada	13966	\$11,328,070
Federal Insurance Co	280763	\$235,297,734
Great Northern Insurance Co	20	\$670
Pacific Indemnity Co	7309	\$9,784,435
Vigilant Insurance Co	16770	\$3,230,203
2018	303229	\$137,058,165
Chubb Ins Co of Canada	21276	\$14,657,186
Federal Insurance Co	261448	\$116,145,727
Great Northern Insurance Co	37	\$1,205
Pacific Indemnity Co	6540	\$4,497,351
Vigilant Insurance Co	13928	\$1,756,697

Dated: July 16, 2019

s/Terrence J. Fleming
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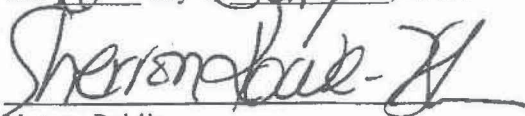
VERIFICATION

Sarada Kotha states under oath that she is an IT Business Analyst; that she is authorized to respond to Plaintiff's Interrogatory No. 17 on behalf of Federal Insurance Company as it relates to Defined Book Run; that she has relied on directors, employees, agents, and attorneys to provide information used in formulating the answer to the above interrogatory; and that the answer is true and correct to the best of her knowledge.



Sarada Kotha

Subscribed and sworn to before me
this 16th day of JUN, 2019.



Notary Public

SHERRON ROWE-HOHN
Notary Public - State of New Jersey
My Commission Expires Sep 5, 2021